1 2 3 4 5 6	KAEMPFER CROWELL Peter C. Bernhard, No. 734 Robert McCoy, No. 9121 Ellsie E. Lucero, No. 15272 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89135 Telephone: (702) 792-7000 Facsimile: (702) 796-7181 Email: pbernhard@kcnvlaw.com Email: rmccoy@kcnvlaw.com Email: elucero@kcnvlaw.com		
7	Attorneys for Plaintiff METEJEMEI, LLC		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	METEJEMEI, LLC, an Nevada limited liability company,	Case No. 2:21-cv-00249-JCM-VCF	
11 12	Plaintiff,	STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES	
13	VS.	(THIRD REQUEST)	
14	MONEYTREE, INC., a Washington corporation; DOES I through X,		
15	inclusive; and ROE BUSINESS ENTITIES I through X, inclusive;		
16	Defendant(s).		
17		I	
18	Plaintiff METEJEMEI, L	LC ("METEJEMEI") and defendant	
19	Moneytree, Inc. ("Moneytree") stipulate to extend the discovery deadline for an		
20	additional 30 days to complete the Rule 30(b)(6) depositions of the parties, pursuant		
21	to Fed. R. Civ. P. 26 as follows:		
22	I. DISCOVERY COMPLETED		
23	1. A Scheduling Order was issued by the Court on March 23, 2021		
24	under ECF No. 13.		

KAEMPFER CROWELL

2963002\_1 15800.9 Page 1 of 3

- 2. METEJEMEI made its initial disclosures on April 1, 2021 and supplemented those disclosures on September 21, 2021.
  - 3. Moneytree made its initial disclosures on March 22, 2021.
- 4. METEJEMEI propounded a first set of document requests to Moneytree on July 21, 2021, to which Moneytree responded on August 30, 2021.
- 5. METEJEMEI propounded a first set of interrogatories to Moneytree on July 28, 2021, to which Plaintiff responded on August 27, 2021.
- 6. Moneytree propounded a first set of document requests to METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7, 2021.
- 7. Moneytree propounded a first set of interrogatories to METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7, 2021.

## II. DISCOVERY REMAINING

- 1. Deposition of the 30(b)(6) Representative for METEJEMEI.
- 2. Deposition of the 30(b)(6) Representative for Moneytree.

## III. REASONS WHY DISCOVERY CANNOT BE COMPLETED

The deposition of METEJEMEI's 30(b)(6) representative was delayed due to health issues. The deposition of Moneytree's 30(b)(6) representative had to be rescheduled due to a close relative being diagnosed with COVID-19. The parties have discussed new dates for the depositions. The deposition of METEJEMEI's 30(b)(6) representative likely will be rescheduled for the last week of October. The deposition of Moneytree's 30(b)(6) representative likely will be rescheduled for the first week of November and will take place in or near Boise, Idaho.

2963002\_1 15800.9 Page 2 of 3

1	IV. CURRENT DEADLINES AND PROPOSED NEW DEADLINES			
2	Event	Current Deadline	<b>Proposed Deadline</b>	
3	Close of Discovery Deadline	October 22, 2021	<b>November 22, 2021</b>	
4	Dispositive Motion Deadline	November 22, 2021	<b>December 22, 2021</b>	
5	If dis	December 22, 2021 <b>January 21, 2022</b> If dispositive motions are filed, the deadline		
6	Joint Pretrial Order for fi	for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.		
7	KAEMPFER CROWELL	BALLARD SPAHR		
8	Van-	/s/ Iool E. Tay	300	
9	1		, No. 14124	
10	Robert McCoy, No. 9121 Ellsie E. Lucero, No. 15272 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89135  Attorneys for Plaintiff METEJEMEI, LLC  1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135  Attorney for Defendant Moneytree, Inc.			
11				
12				
13				
14	ORDER			
15	IT IS SO ORDERED.		Sandar C	
16		Carrie		
17		UNITED STATES	MAGISTRATE JUDGE	
18		DATED:10-2	2-2021	
19				
20				
21				
22				
23				
24				

KAEMPFER CROWELL

2963002\_1 15800.9 Page 3 of 3